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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

| | |
|----------------------------------|---------------------|
| In re: |) Chapter 11 |
| |) |
| POWELL VALLEY HEALTH CARE, INC., |) Case No. 16-20326 |
| |) |
| Debtor-in-Possession. |) |

**AGREED MOTION TO EXTEND UMIA INSURANCE, INC.'S, OBJECTION
DEADLINE TO THE DEBTOR'S AMENDED CHAPTER 11 PLAN**

COMES NOW UMIA Insurance, Inc. ("UMIA"), for this Agreed Motion to Extend UMIA's Objection Deadline to the Debtor's Amended Chapter 11 Plan (the "**Motion**"). In support of the Motion, UMIA states as follows:

1. Pursuant to this Court's Order dated November 28, 2017, UMIA currently has until December 6, 2017 to file its objection to the Debtor's Amended Chapter 11 Plan. (*See* Docket No. 741 at ¶ 2).

2. As set forth in the Unsecured Creditors' Committee's Comment and Limited Objection to the Debtor's Amended Chapter 11 Plan, UMIA along with numerous other parties are close to finalizing the terms of a settlement agreement that would "resolve all issues with UMIA." (*See* Docket No. 759 at ¶ 1).

3. In order to further facilitate the finalizing of the proposed settlement, the Debtor has agreed to extend UMIA's objection deadline to the Amended Chapter 11 Plan by two (2)

days to Friday December 8, 2017. Attached hereto as **Exhibit A** is an email correspondence indicating the Debtor's agreement to such extension.

4. UMIA contends that the extension of its objection deadline to the Amended Chapter 11 Plan is necessary in order to further finalize the remaining terms of the proposed settlement agreement with the other parties thereto.

WHEREFORE, UMIA respectfully requests the Court enter an order substantially in the form attached hereto at **Exhibit A** which extends UMIA's objection deadline by two (2) days to December 8, 2017, and for such other and further relief this Court deems proper.

Dated: December 6, 2017.

MOYE WHITE LLP

By: /s/ Timothy M. Swanson
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CERTIFICATE OF SERVICE

The undersigned certifies that on December 6, 2017, a copy of the foregoing was filed with the Court and served *electronically* upon all parties receiving electronic notice in this case from the Court's CM/ECF noticing system.

/s/Timothy M. Swanson
Timothy M. Swanson